

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

K.S., and through her parents and next friends,  
T.S. and A.R.,

Plaintiff,

v.

Case No. 1:14-cv-385 SCY/KBM

THE SANTA FE PUBLIC SCHOOLS;  
VICKIE L. SEWING, in her individual capacity;  
THE ESPANOLA PUBLIC SCHOOLS;  
RUBY E. MONTOYA, in her individual capacity;  
GARY F. GREGOR, in his individual capacity;

Defendants.

**DEFENDANTS SANTA FE PUBLIC SCHOOLS AND VICKIE L. SEWING'S  
ANSWER TO FIRST AMENDED COMPLAINT**

COME NOW Defendants Santa Fe Public Schools and Vickie L. Sewing, by and through their attorney of record, Brown Law Firm, Brown and Gurulé, by Kevin M. Brown, Desiree D. Gurulé and Keya Koul, and hereby submit their Answer to Plaintiff's First Amended Complaint as follows:

**PARTIES**

1. In answering Paragraph 1 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

2. In answering Paragraph 2 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

3. In answering Paragraph 3 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations contained therein constitute legal

conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied.

4. In answering Paragraph 4 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied.

5. In answering Paragraph 5 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

6. In answering Paragraph 6 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

7. In answering Paragraph 7 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied.

8. In answering Paragraph 8 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied.

## **JURISDICTION AND VENUE**

9. In answering Paragraph 9 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied.

10. In answering Paragraph 10 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied.

## **FACTUAL ALLEGATIONS**

### **I. THE CAREER AND PREDATION HISTORY OF DEFENDANT GREGOR**

11. In answering Paragraph 11 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

12. In answering Paragraph 12 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

13. In answering Paragraph 13 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this

paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

14. In answering Paragraph 14 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

15. In answering Paragraph 15 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

16. In answering Paragraph 16 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

17. In answering Paragraph 17 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

18. In answering Paragraph 18 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant

in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

19. In answering Paragraph 19 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

20. In answering Paragraph 20 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

21. In answering Paragraph 21 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

22. In answering Paragraph 22 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

23. In answering Paragraph 23 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

24. In answering Paragraph 24 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

25. In answering Paragraph 25 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

26. In answering Paragraph 26 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

27. In answering Paragraph 27 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this

paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

28. In answering Paragraph 28 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

29. In answering Paragraph 29 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

30. In answering Paragraph 30 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action and to a non-named party, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

## **II. DEFENDANT GREGOR'S EMPLOYMENT BY DEFENDANT SFPS**

31. In answering Paragraph 31 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

32. In answering Paragraph 32 of Plaintiff's First Amended Complaint, Defendant Santa Fe Public Schools are without sufficient information to either admit or deny this allegation; therefore it is denied. Defendant Vickie L. Sewing states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Vickie L. Sewing, those allegations are specifically denied.

33. In answering Paragraph 33 of Plaintiff's First Amended Complaint, Defendant Santa Fe Public Schools are without sufficient information to either admit or deny this allegation; therefore it is denied. Defendant Vickie L. Sewing states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Vickie L. Sewing, those allegations are specifically denied.

34. In answering Paragraph 34 of Plaintiff's First Amended Complaint, Defendant Santa Fe Public Schools are without sufficient information to either admit or deny this allegation; therefore it is denied. Defendant Vickie L. Sewing states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Vickie L. Sewing, those allegations are specifically denied.

35. In answering Paragraph 35 of Plaintiff's First Amended Complaint, Defendant Santa Fe Public Schools are without sufficient information to either admit or deny this allegation; therefore it is denied. Defendant Vickie L. Sewing states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Vickie L. Sewing, those allegations are specifically denied.



36. In answering Paragraph 36 of Plaintiff's First Amended Complaint, Defendant Santa Fe Public Schools admits the allegations contained therein. Defendant Vickie L. Sewing states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Vickie L. Sewing, those allegations are specifically denied.

37. In answering Paragraph 37 of Plaintiff's First Amended Complaint, Defendant Santa Fe Public Schools denies the allegations contained therein. Defendant Vickie L. Sewing states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Vickie L. Sewing, those allegations are specifically denied.

38. In answering Paragraph 38 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

39. In answering Paragraph 39 of Plaintiff's First Amended Complaint, Defendant Santa Fe Public Schools admits the allegations contained therein. Defendant Vickie L. Sewing states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Vickie L. Sewing, those allegations are specifically denied.

40. In answering Paragraph 40 of Plaintiff's First Amended Complaint, Defendant Vickie L. Sewing denies the allegations contained therein. Defendant Santa Fe Public Schools states that the allegations pertain to another Defendant in this action, therefore no response is required.

To the extent that allegations are contained in this paragraph concerning Defendant Santa Fe Public Schools, those allegations are specifically denied.

41. In answering Paragraph 41 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

42. In answering Paragraph 42 of Plaintiff's First Amended Complaint, Defendant Vickie L. Sewing admits the allegations contained therein. Defendant Santa Fe Public Schools states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Santa Fe Public Schools, those allegations are specifically denied.

43. In answering Paragraph 43 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

44. In answering Paragraph 44 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

45. In answering Paragraph 45 of Plaintiff's First Amended Complaint, Defendant Vickie L. Sewing denies the allegations contained therein. Defendant Santa Fe Public Schools states that the allegations pertain to another Defendant in this action, therefore no response is required.

To the extent that allegations are contained in this paragraph concerning Defendant Santa Fe Public Schools, those allegations are specifically denied.

46. In answering Paragraph 46 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing deny the allegations contained therein.

47. In answering Paragraph 47 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

48. In answering Paragraph 48 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

49. In answering Paragraph 49 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

50. In answering Paragraph 50 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

51. In answering Paragraph 51 of Plaintiff's First Amended Complaint, Defendant Santa Fe Public Schools admits the allegations contained therein. Defendant Vickie L. Sewing states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Vickie L. Sewing, those allegations are specifically denied.

52. In answering Paragraph 52 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

53. In answering Paragraph 53 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

54. In answering Paragraph 54 of Plaintiff's First Amended Complaint, Defendant Vickie L. Sewing is without sufficient information to either admit or deny this allegation; therefore it is denied. Defendant Santa Fe Public Schools states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Santa Fe Public Schools, those allegations are specifically denied.

55. In answering Paragraph 55 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

56. In answering Paragraph 56 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

57. In answering Paragraph 57 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

- a. In answering Paragraph 57a. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.
- b. In answering Paragraph 57b. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.
- c. In answering Paragraph 57c. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.
- d. In answering Paragraph 57d. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

e. In answering Paragraph 57e. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

f. In answering Paragraph 57f. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

58. In answering Paragraph 58 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

59. In answering Paragraph 59 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

60. In answering Paragraph 60 of Plaintiff's First Amended Complaint, Defendant Santa Fe Public Schools admits the allegations contained therein. Defendant Vickie L. Sewing states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Vickie L. Sewing, those allegations are specifically denied.

61. In answering Paragraph 61 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

62. In answering Paragraph 62 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied.

63. In answering Paragraph 63 of Plaintiff's First Amended Complaint, Defendant Santa Fe Public Schools is without sufficient information to either admit or deny this allegation; therefore it is denied. Defendant Vickie L. Sewing states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Vickie L. Sewing, those allegations are specifically denied.

64. In answering Paragraph 64 of Plaintiff's First Amended Complaint, Defendant Santa Fe Public Schools is without sufficient information to either admit or deny this allegation; therefore it is denied. Defendant Vickie L. Sewing states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Vickie L. Sewing, those allegations are specifically denied.

65. In answering Paragraph 65 of Plaintiff's First Amended Complaint, Defendant Santa Fe Public Schools denies the allegations contained therein. Defendant Vickie L. Sewing states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Vickie L. Sewing, those allegations are specifically denied.

66. In answering Paragraph 66 of Plaintiff's First Amended Complaint, Defendant Santa Fe Public Schools admits the allegations contained therein. Defendant Vickie L. Sewing states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Vickie L. Sewing, those allegations are specifically denied.

- a. In answering Paragraph 66a. of Plaintiff's First Amended Complaint, Defendant Santa Fe Public Schools admits the allegations contained therein. Defendant Vickie L. Sewing states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Vickie L. Sewing, those allegations are specifically denied.
- b. In answering Paragraph 66b. of Plaintiff's First Amended Complaint, Defendant Santa Fe Public Schools admits the allegations contained therein. Defendant Vickie L. Sewing states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Vickie L. Sewing, those allegations are specifically denied.
- c. In answering Paragraph 66c. of Plaintiff's First Amended Complaint, Defendant Santa Fe Public Schools admits the allegations contained therein. Defendant Vickie L. Sewing states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Vickie L. Sewing, those allegations are specifically denied.



d. In answering Paragraph 66d. of Plaintiff's First Amended Complaint, Defendant Santa Fe Public Schools admits the allegations contained therein. Defendant Vickie L. Sewing states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Vickie L. Sewing, those allegations are specifically denied.

e. In answering Paragraph 66e. of Plaintiff's First Amended Complaint, Defendant Santa Fe Public Schools admits the allegations contained therein. Defendant Vickie L. Sewing states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Vickie L. Sewing, those allegations are specifically denied.

67. In answering Paragraph 67 of Plaintiff's First Amended Complaint, Defendant Santa Fe Public Schools denies the allegations contained therein. Defendant Vickie L. Sewing states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Vickie L. Sewing, those allegations are specifically denied.

68. In answering Paragraph 68 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

69. In answering Paragraph 69 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

70. In answering Paragraph 70 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

71. In answering Paragraph 71 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

### **III. DEFENDANT GREGOR'S EMPLOYMENT BY DEFENDANT EPS**

72. In answering Paragraph 72 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

73. In answering Paragraph 73 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

74. In answering Paragraph 74 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

75. In answering Paragraph 75 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant

in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

76. In answering Paragraph 76 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

77. In answering Paragraph 77 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

78. In answering Paragraph 78 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

79. In answering Paragraph 79 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

80. In answering Paragraph 80 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

81. In answering Paragraph 81 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

82. In answering Paragraph 82 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

83. In answering Paragraph 83 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

84. In answering Paragraph 84 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

85. In answering Paragraph 85 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

86. In answering Paragraph 86 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

87. In answering Paragraph 87 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

88. In answering Paragraph 88 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

89. In answering Paragraph 89 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

- a. In answering Paragraph 89a. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.
- b. In answering Paragraph 89b. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.
- c. In answering Paragraph 89c. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.
- d. In answering Paragraph 89d. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.
- e. In answering Paragraph 89e. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent

that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

- f. In answering Paragraph 89f. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.
- g. In answering Paragraph 89g. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.
- h. In answering Paragraph 89h. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.
- i. In answering Paragraph 89i. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.
- j. In answering Paragraph 89j. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to

another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

- k. In answering Paragraph 89k. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.
- l. In answering Paragraph 89l. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.
- m. In answering Paragraph 89m. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.
- n. In answering Paragraph 89n. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.



90. In answering Paragraph 90 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

91. In answering Paragraph 91 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

92. In answering Paragraph 92 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

93. In answering Paragraph 93 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

94. In answering Paragraph 94 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this

paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

95. In answering Paragraph 95 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

96. In answering Paragraph 96 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

97. In answering Paragraph 97 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

98. In answering Paragraph 98 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

99. In answering Paragraph 99 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

100. In answering Paragraph 100 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

101. In answering Paragraph 101 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

102. In answering Paragraph 102 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

103. In answering Paragraph 103 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

104. In answering Paragraph 104 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

105. In answering Paragraph 105 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this

paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

106. In answering Paragraph 106 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

107. In answering Paragraph 107 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

108. In answering Paragraph 108 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

109. In answering Paragraph 109 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

110. In answering Paragraph 110 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant

in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

111. In answering Paragraph 111 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

112. In answering Paragraph 112 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

113. In answering Paragraph 113 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

114. In answering Paragraph 114 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

115. In answering Paragraph 115 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this

paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

116. In answering Paragraph 116 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

117. In answering Paragraph 117 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

118. In answering Paragraph 118 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

119. In answering Paragraph 119 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

120. In answering Paragraph 120 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant

in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

121. In answering Paragraph 121 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

122. In answering Paragraph 122 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

123. In answering Paragraph 123 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

124. In answering Paragraph 124 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

125. In answering Paragraph 125 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

126. In answering Paragraph 126 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

127. In answering Paragraph 127 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

128. In answering Paragraph 128 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

129. In answering Paragraph 129 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.



130. In answering Paragraph 130 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

131. In answering Paragraph 131 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

132. In answering Paragraph 132 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

133. In answering Paragraph 133 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

**A. DEFENDANT GREGOR'S SEXUAL ABUSE OF STUDENT VS**

134. In answering Paragraph 134 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this

paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

135. In answering Paragraph 135 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

136. In answering Paragraph 136 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

137. In answering Paragraph 137 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

138. In answering Paragraph 138 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

139. In answering Paragraph 139 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant

in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

140. In answering Paragraph 140 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

141. In answering Paragraph 141 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

142. In answering Paragraph 142 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

143. In answering Paragraph 143 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

144. In answering Paragraph 144 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

145. In answering Paragraph 145 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

146. In answering Paragraph 146 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

147. In answering Paragraph 147 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

148. In answering Paragraph 148 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this

paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

149. In answering Paragraph 149 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

150. In answering Paragraph 150 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

**B. DEFENDANT GREGOR'S SEXUAL ABUSE OF STUDENT NH**

151. In answering Paragraph 151 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

152. In answering Paragraph 152 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

153. In answering Paragraph 153 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this

paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

154. In answering Paragraph 154 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

155. In answering Paragraph 155 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

156. In answering Paragraph 156 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

157. In answering Paragraph 157 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

158. In answering Paragraph 158 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

159. In answering Paragraph 159 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

160. In answering Paragraph 160 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

161. In answering Paragraph 161 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

162. In answering Paragraph 162 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

163. In answering Paragraph 163 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this

paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

164. In answering Paragraph 164 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

165. In answering Paragraph 165 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

166. In answering Paragraph 166 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

167. In answering Paragraph 167 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

168. In answering Paragraph 168 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant



in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

169. In answering Paragraph 169 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

170. In answering Paragraph 170 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

171. In answering Paragraph 171 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

172. In answering Paragraph 172 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

173. In answering Paragraph 173 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this

paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

**C. DEFENDANT GREGOR'S SEXUAL ABUSE OF PLAINTIFF KS**

174. In answering Paragraph 174 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

175. In answering Paragraph 175 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

176. In answering Paragraph 176 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

177. In answering Paragraph 177 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

178. In answering Paragraph 178 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this

paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

179. In answering Paragraph 179 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

180. In answering Paragraph 180 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

181. In answering Paragraph 181 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

182. In answering Paragraph 182 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

183. In answering Paragraph 183 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this

paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

184. In answering Paragraph 184 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

185. In answering Paragraph 185 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

186. In answering Paragraph 186 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

187. In answering Paragraph 187 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

188. In answering Paragraph 188 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

189. In answering Paragraph 189 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this

paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

190. In answering Paragraph 190 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

191. In answering Paragraph 191 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

192. In answering Paragraph 192 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

193. In answering Paragraph 193 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

194. In answering Paragraph 194 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant

in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

195. In answering Paragraph 195 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

196. In answering Paragraph 196 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

197. In answering Paragraph 197 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

198. In answering Paragraph 198 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

199. In answering Paragraph 199 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this

paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

200. In answering Paragraph 200 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

201. In answering Paragraph 201 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

202. In answering Paragraph 202 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

**D. DEFENDANT GREGOR'S ABUSE IS REPORTED TO LAW ENFORCEMENT**

203. In answering Paragraph 203 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

204. In answering Paragraph 204 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

205. In answering Paragraph 205 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing are without sufficient information to either admit or deny this allegation; therefore it is denied.

206. In answering Paragraph 206 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

**IV. POST-REPORTING BEHAVIOR OF DEFENDANT MONTOYA AND DEFENDANT EPS**

207. In answering Paragraph 207 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

208. In answering Paragraph 208 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

209. In answering Paragraph 209 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.



210. In answering Paragraph 210 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

211. In answering Paragraph 211 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

- a. In answering Paragraph 211a. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.
- b. In answering Paragraph 211b. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.
- c. In answering Paragraph 211c. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent

that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

- d. In answering Paragraph 211d. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

212. In answering Paragraph 212 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

213. In answering Paragraph 213 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

214. In answering Paragraph 214 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

- a. In answering Paragraph 214a. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to

another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

b. In answering Paragraph 214b. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

c. In answering Paragraph 214c. of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

215. In answering Paragraph 215 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

216. In answering Paragraph 216 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

217. In answering Paragraph 217 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

218. In answering Paragraph 218 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

219. In answering Paragraph 219 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

## **COUNT I**

### **(Plaintiff's Claims Against Defendant Gregor Under 42 U.S.C §1983)**

220. In answering Paragraph 220 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing incorporate and reassert all of the preceding paragraphs above as though fully set forth herein.

221. In answering Paragraph 221 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied.

222. In answering Paragraph 222 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

223. In answering Paragraph 223 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

224. In answering Paragraph 224 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

225. In answering Paragraph 225 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

226. In answering Paragraph 226 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this

paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

227. In answering Paragraph 227 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

228. In answering Paragraph 228 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

229. In answering Paragraph 229 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

230. In answering Paragraph 230 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

## **COUNT II**

**(Plaintiff's Claim Against Defendant SFPS and EPS Under 42 U.S.C §1983)**

231. In answering Paragraph 231 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing incorporate and reassert all of the preceding paragraphs above as though fully set forth herein.

232. In answering Paragraph 232 of Plaintiff's First Amended Complaint, Defendant Santa Fe Public Schools states that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied. Defendant Vickie L. Sewing states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Vickie L. Sewing, those allegations are specifically denied.

233. In answering Paragraph 233 of Plaintiff's First Amended Complaint, Defendant Santa Fe Public Schools states that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied. Defendant Vickie L. Sewing states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Vickie L. Sewing, those allegations are specifically denied.

234. In answering Paragraph 234 of Plaintiff's First Amended Complaint, Defendant Santa Fe Public Schools states that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied. Defendant Vickie L. Sewing states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Vickie L. Sewing, those allegations are specifically denied.

235. In answering Paragraph 235 of Plaintiff's First Amended Complaint, Defendant Santa Fe Public Schools states that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied. Defendant Vickie L. Sewing states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Vickie L. Sewing, those allegations are specifically denied.

236. In answering Paragraph 236 of Plaintiff's First Amended Complaint, Defendant Santa Fe Public Schools states that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied. Defendant Vickie L. Sewing states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Vickie L. Sewing, those allegations are specifically denied.

237. In answering Paragraph 237 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied.

### **COUNT III**

#### **(Plaintiff's Claims Against Defendant Sewing Under 42 U.S.C. §1983)**

238. In answering Paragraph 238 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing incorporate and reassert all of the preceding paragraphs above as though fully set forth herein.



239. In answering Paragraph 239 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied.

240. In answering Paragraph 240 of Plaintiff's First Amended Complaint, Defendant Vickie L. Sewing states that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied. Defendant Santa Fe Public Schools states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Santa Fe Public Schools, those allegations are specifically denied.

241. In answering Paragraph 241 of Plaintiff's First Amended Complaint, Defendant Vickie L. Sewing states that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied. Defendant Santa Fe Public Schools states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Santa Fe Public Schools, those allegations are specifically denied.

242. In answering Paragraph 242 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied.

243. In answering Paragraph 243 of Plaintiff's First Amended Complaint, Defendant Vickie L. Sewing states that the allegations contained therein constitute legal conclusions, therefore

no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied. Defendant Santa Fe Public Schools states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Santa Fe Public Schools, those allegations are specifically denied.

244. In answering Paragraph 244 of Plaintiff's First Amended Complaint, Defendant Vickie L. Sewing states that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied. Defendant Santa Fe Public Schools states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Santa Fe Public Schools, those allegations are specifically denied.

245. In answering Paragraph 245 of Plaintiff's First Amended Complaint, Defendant Vickie L. Sewing states that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied. Defendant Santa Fe Public Schools states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Santa Fe Public Schools, those allegations are specifically denied.

246. In answering Paragraph 246 of Plaintiff's First Amended Complaint, Defendant Vickie L. Sewing states that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied. Defendant Santa Fe Public Schools states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that

allegations are contained in this paragraph concerning Defendant Santa Fe Public Schools, those allegations are specifically denied.

247. In answering Paragraph 247 of Plaintiff's First Amended Complaint, Defendant Vickie L. Sewing states that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied. Defendant Santa Fe Public Schools states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Santa Fe Public Schools, those allegations are specifically denied.

248. In answering Paragraph 248 of Plaintiff's First Amended Complaint, Defendant Vickie L. Sewing states that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied. Defendant Santa Fe Public Schools states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Santa Fe Public Schools, those allegations are specifically denied.

#### **COUNT IV**

##### **(Plaintiff's Claims Against Defendant Montoya Under 42 U.S.C. §1983)**

249. In answering Paragraph 249 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing incorporate and reassert all of the preceding paragraphs above as though fully set forth herein.

250. In answering Paragraph 250 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations contained therein constitute

legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied.

251. In answering Paragraph 251 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

252. In answering Paragraph 252 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

253. In answering Paragraph 253 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

254. In answering Paragraph 254 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

255. In answering Paragraph 255 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant

in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

256. In answering Paragraph 256 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

257. In answering Paragraph 257 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

258. In answering Paragraph 258 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

259. In answering Paragraph 259 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

## **COUNT V**

### **(Plaintiff's Claims Against Defendant EPS Under Title IX, 20 U.S.C. §§1681-1688, for Sexual Abuse)**

260. In answering Paragraph 260 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing incorporate and reassert all of the preceding paragraphs above as though fully set forth herein.

261. In answering Paragraph 261 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

262. In answering Paragraph 262 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

263. In answering Paragraph 263 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

264. In answering Paragraph 264 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this

paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

265. In answering Paragraph 265 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

266. In answering Paragraph 266 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

267. In answering Paragraph 267 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

268. In answering Paragraph 268 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

269. In answering Paragraph 269 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant

in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

270. In answering Paragraph 270 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

271. In answering Paragraph 271 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

272. In answering Paragraph 272 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

273. In answering Paragraph 273 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied.

## **COUNT VI**

**(Plaintiff's Claim Against Defendant EPS Under the New Mexico Tort Claims Act, NMSA 1978, §41-4-6)**



274. In answering Paragraph 274 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing incorporate and reassert all of the preceding paragraphs above as though fully set forth herein.

275. In answering Paragraph 275 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

276. In answering Paragraph 276 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

277. In answering Paragraph 277 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

278. In answering Paragraph 278 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

279. In answering Paragraph 279 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

280. In answering Paragraph 280 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

281. In answering Paragraph 281 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

282. In answering Paragraph 282 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

283. In answering Paragraph 283 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this

paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

284. In answering Paragraph 284 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

285. In answering Paragraph 285 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

286. In answering Paragraph 286 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

287. In answering Paragraph 287 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

288. In answering Paragraph 288 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant

in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

## **COUNT VII**

### **(Plaintiff's Common Law Battery Claim Against Defendant Gregor)**

289. In answering Paragraph 289 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing incorporate and reassert all of the preceding paragraphs above as though fully set forth herein.

290. In answering Paragraph 290 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

291. In answering Paragraph 291 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

292. In answering Paragraph 292 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

293. In answering Paragraph 293 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

294. In answering Paragraph 294 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

#### **COUNT VII**

##### **(Plaintiff's Common Law Negligence Per Se Claim Against Defendant Gregor)**

295. In answering Paragraph 295 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing incorporate and reassert all of the preceding paragraphs above as though fully set forth herein.

296. In answering Paragraph 296 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

297. In answering Paragraph 297 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this

paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

298. In answering Paragraph 298 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

### **COUNT IX**

#### **(Plaintiff's Common Law Intentional Infliction of Emotional Distress/Outrage Against Defendant Gregor)**

299. In answering Paragraph 299 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing incorporate and reassert all of the preceding paragraphs above as though fully set forth herein.

300. In answering Paragraph 300 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

301. In answering Paragraph 301 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

302. In answering Paragraph 302 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations pertain to another Defendant

in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendants Santa Fe Public Schools and Vickie L. Sewing, those allegations are specifically denied.

## **COUNT X**

### **(Plaintiff's Common Law Negligence Per Se Claim Against Defendants Sewing and Montoya)**

303. In answering Paragraph 303 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing incorporate and reassert all of the preceding paragraphs above as though fully set forth herein.

304. In answering Paragraph 304 of Plaintiff's First Amended Complaint, Defendant Vickie L. Sewing state that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied. Defendant Santa Fe Public Schools states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Santa Fe Public Schools, those allegations are specifically denied.

305. In answering Paragraph 305 of Plaintiff's First Amended Complaint, Defendant Vickie L. Sewing state that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied. Defendant Santa Fe Public Schools states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Santa Fe Public Schools, those allegations are specifically denied.

306. In answering Paragraph 306 of Plaintiff's First Amended Complaint, Defendant Vickie L. Sewing state that the allegations contained therein constitute legal conclusions, therefore

no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied. Defendant Santa Fe Public Schools states that the allegations pertain to another Defendant in this action, therefore no response is required. To the extent that allegations are contained in this paragraph concerning Defendant Santa Fe Public Schools, those allegations are specifically denied.

### **PRAYER FOR RELIEF**

307. In answering Paragraph 307 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing incorporate and reassert all of the preceding paragraphs above as though fully set forth herein.

308. In answering Paragraph 308 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied.

309. In answering Paragraph 309 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied.

310. In answering Paragraph 310 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations contained therein constitute legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied.

311. In answering Paragraph 311 of Plaintiff's First Amended Complaint, Defendants Santa Fe Public Schools and Vickie L. Sewing state that the allegations contained therein constitute



legal conclusions, therefore no response is required. In the event factual allegations are contained and a response is required, the allegations are specifically denied.

### **AFFIRMATIVE DEFENSES**

1. Plaintiff fails to state a claim for relief which may be granted;
2. Plaintiff's complaint was not timely filed and is barred by the statute of limitations;
3. Plaintiff's claims should be barred because of lack of standing.
4. Defendants did not breach any duty owed to Plaintiff in this action;
5. Punitive damages are not recoverable for all or part of Plaintiff's claims;
6. Plaintiff has failed to mitigate any of the damages alleged in her Complaint;
7. Defendants were not the proximate cause of Plaintiff's alleged injuries;
8. Plaintiff's claims should be barred because of an independent intervening cause;
9. Defendants are entitled to qualified immunity for some or all of Plaintiff's claims in this matter;
10. There is no waiver of immunity for some or all of Plaintiff's state law claims under the New Mexico Tort Claims Act, NMSA 1978 Section 41-4-1 et seq.;
11. At all times relevant hereto, Defendants' actions did not amount to deliberate indifference to the welfare of the students;
12. Plaintiff has failed to demonstrate that Defendants' conduct rose to the level necessary to establish a violation of any statutory or constitutional right;
13. Plaintiff's substantive due process claims are barred because there is not a special relationship under *DeShaney*;
14. Plaintiff's substantive due process claims are barred because Defendants' actions do not shock the conscience of the court;

15. To the extent that Plaintiff attempts to state any claims against the Santa Fe Public Schools or any Defendant in their “official capacity” under federal law, then Plaintiff’s claims are barred because there is not a pattern of alleged unconstitutional acts and/or deliberate indifference to Plaintiff’s rights, and/or by the authorization or approval of the alleged unconstitutional acts by the adoption and/or implementation of an official plan or policy;

16. There is no respondeat superior liability under 42 U.S.C. Section 1983;

17. Defendants affirmatively state that if they were at fault in any respect, which is specifically denied, the fault of all persons and entities must be considered, and liability apportioned among all persons and entities at fault;

18. Plaintiff has not provided notice as required by the Tort Claims Act.

WHEREFORE, Defendants Santa Fe Public Schools and Vickie L. Sewing having fully answered Plaintiff’s First Amended Complaint, prays that the Plaintiff’s First Amended Complaint be dismissed with prejudice, Defendants be awarded the costs incurred herein, and for such other relief as the Court deems just and proper.

Respectfully submitted:

*BROWN LAW FIRM  
BROWN & GURULÉ*

*Keya Koul 05/19/14*  
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Vickie L. Sewing  
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I HEREBY CERTIFY that on this 19<sup>th</sup> day of May, 2014, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

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Keya Koul  
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